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IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
 PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.; G.M.;
 A.S.; and L.T., individuals on behalf of themselves
 and all others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL
 BUREAU OF PRISONS, et al.,

Defendants.

Case No. 4:23-CV-04155-YGR

DECLARATION OF STEPHEN CHA-KIM IN SUPPORT OF ADMINISTRATIVE MOTION TO CONSIDER WHETHER MATERIAL SHOULD BE SEALED REGARDING PLAINTIFFS' NOTICE IN RESPONSE TO THE UNITED STATES' UNDER SEAL FILINGS AT ECF NO. 197

1 I, Stephen Cha-Kim, hereby declare as follows:

2 1. I am an attorney admitted to practice *pro hac vice* in this Court. I am a Partner at
3 the law firm of Arnold & Porter Kaye Scholer LLP and counsel for Plaintiffs in the above
4 captioned matter.

5 2. I submit this declaration in support of Plaintiffs' Administrative Motion To
6 Consider Whether Material Should Be Sealed Regarding Plaintiffs' Notice In Response To The
7 United States' Under Seal Filings At ECF No. 197. I have personal knowledge of the facts
8 stated herein and, if called as a witness, could and would testify competently thereto.

9 3. Plaintiffs' Notice In Response To The United States' Under Seal Filings At ECF
10 No. 197, and the Declaration of Oren Nimni with Exhibits A-D in support thereof, contain
11 information that the United States requested be sealed at ECF No. 197.

12 4. Additionally, I participated in a side bar discussion with the Court during the
13 February 27, 2024 hearing where the Court instructed the Parties to file this information under
14 seal.

15 I declare under penalty of perjury that the foregoing is true and correct. Executed in New
16 York, NY, on this 8th day of March, 2024.

17 **ARNOLD & PORTER KAYE SCHOLER LLP**

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19 By: /s/ Stephen Cha-Kim
Stephen Cha-Kim

20 *Attorneys for Plaintiffs*
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